

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

FDIC AS RECEIVER FOR THE NATIONAL )  
REPUBLIC BANK OF CHICAGO, ) Case No. 19-cv-6917  
 )  
 Plaintiff, )  
 ) Honorable Judge Robert M. Dow, Jr.  
 v. )  
 )  
 HIREN PATEL, ) Magistrate Judge Maria Valdez  
 )  
 Defendant. )

## **UPDATED JOINT STATUS REPORT**

Plaintiff Federal Deposit Insurance Corporation as Receiver for The National Republic Bank of Chicago (“FDIC-R”) and Defendant Hiren Patel (“Mr. Patel”), pursuant to docket entry number 63, entered on July 1, 2021, submit the below updated joint status report.

1. On December 22, 2020, the Court adopted the parties' proposed discovery plan, requiring fact discovery to conclude by November 1, 2021, and expert discovery to conclude by January 31, 2022. [Dkt. 35.]

2. On September 16, 2021, the parties filed a joint motion to modify the discovery plan that sought to extend the fact discovery deadline to June 3, 2022, and the expert discovery deadline to September 2, 2022. [Dkt. 74.]

3. On September 20, 2021, the Honorable Maria Valdez granted the parties' joint motion and, in addition to extending the fact and expert discovery deadlines, ordered that the parties file a joint status report no later than November 17, 2021 detailing their discovery progress and the prospects of settlement. [Dkt. 76.]

4. On September 20, 2021, the Honorable Maria Valdez granted FDIC-R's motion for a protective order as to certain third-party subpoenas. On October 4, 2021, Mr. Patel filed his

objections to the Court's September 20, 2021 order. Pursuant to this Court's October 11, 2021 order, FDIC-R filed its response on October 18, 2021. The Court's October 11, 2021 order stated that it "will issue a ruling by mail." At the time of this filing, no ruling has been issued.

5. The parties continue to engage in document production and written discovery and expect to start taking depositions, either in-person or virtually, in early 2022. On October 15, 2021, existing restrictions on business travel by FDIC-R personnel were extended until January 2, 2022.

6. Prior settlement discussions have been unsuccessful, although the parties expect they will revisit the topic, as appropriate, after the parties have taken more fact discovery.

Respectfully submitted,

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